

NNH-CV16-6063513-S

SUPERIOR COURT

DANIEL GREER

J.D. OF NEW HAVEN

VS.

AT NEW HAVEN

LAWRENCE S. DRESSLER

MARCH 15, 2017

ANSWER, SPECIAL DEFENSES AND COUNTERCLAIM

COUNT I

1. Upon information and belief, the allegations in Paragraph 1 are admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. The Defendant admits so much of Paragraph 4 as alleges that on or about April 14, 2016, the Defendant reported that a claim of sexual molestation against Daniel Greer had recently settled in the millions of dollars and described said settlement as “hush money.” Said statements were based on information and statements provided to the Defendant by the very highly respected Rabbi Muroff, who himself received said information from the most respected Orthodox Jewish organization in the United States, Torah Umesorah. The Defendant specifically denies that the report he made on or about April 14, 2016 was false.
5. The Defendant admits that on or about April 18, 2016 the Plaintiff, through his attorney, demanded a retraction of the report made by the Defendant on or about April 14, 2016. The Defendant specifically denies that said report contained any false or defamatory statements about the Plaintiff.
6. Paragraph 6 is admitted.

7. Paragraph 7 is denied.
8. Paragraph 8 is denied.
9. Paragraph 9 is denied.
10. Paragraph 10 is denied.

COUNT II

1-10. The answers contained in Paragraphs 1-10 of the First Count are hereby incorporated by reference and made the answers to Paragraphs 1-10 of this, the Second Count, as if fully set forth herein.

11. Paragraph 11 is denied.
12. Paragraph 12 is denied.
13. Paragraph 13 is denied.
14. Paragraph 14 is denied.

SPECIAL DEFENSES

1. Any statements reported or published by the Defendant concerning the Plaintiff and which form the basis of the Plaintiff's claims were made in good faith and were conveyed to him as true statements based on information derived from a prominent rabbi and a prominent educational institution.
2. Any statements reported or published by the Defendant concerning the Plaintiff and which form the basis of the Plaintiff's claims are true.

3. At all times referred to in the Complaint the Plaintiff was, and continues to be, a public figure or a limited public figure and all statements reported or published by the Defendant concerning the Plaintiff and which form the basis of the Plaintiff's claims were made with an absence of malice.

COUNTERCLAIM

I. COUNT I: AS TO DANIEL GREER, THE YESHIVA OF NEW HAVEN, EDGEWOOD VILLAGE INC., EDGEWOOD ELM VILLAGE, INC., F.O.H., INC.

1. At all times mentioned herein Lawrence Dressler was a resident of the City of New Haven

2. At all times mentioned herein Daniel Greer was, and still is, a rabbi in the City of New Haven, and operates a synagogue and Jewish school known as "The Yeshiva of New Haven" also known as "The New Haven Torah Center" which is located at 782 Elm Street, New Haven, CT and is a registered non-profit organization.

3. At all times mentioned herein Daniel Greer owned a significant number of real estate rental properties in the area around his synagogue, which are also operated by Daniel Greer under the names of various non-profit organizations owned and controlled by Daniel Greer, with such names as Edgewood Village Inc., Edgewood Elm Village Inc., F.O.H., Inc.

4. At all times mentioned herein the synagogue and adjoining fenced in properties owned and operated by Daniel Greer and managed by Daniel Greer, were known as "The Compound."

5. At all times mentioned herein Daniel Greer worked, controlled and managed all religious activities at the Greer synagogue and controlled and managed the various non-profit organizations under which the synagogue and properties operated.

6. At all times mentioned herein the non-profit organizations controlled and managed by Daniel Greer were mere corporate shells, controlled and dominated by Daniel Greer, who exercised complete dominion and control over said entities.

7. At all times mentioned herein Daniel Greer used the non-profit organizations and entities in order to commit financial fraud and defraud donors of their money, and commit other crimes and violations of religious and secular laws.

8. Said organizations and non-profit entities are the alter ego of Daniel Greer who utilized said entities in order to solicit monetary donations under false pretenses and misrepresentations that said organizations were legitimate law abiding non-profit entities that strictly followed Jewish religious practices and beliefs, when in reality Rabbi Daniel Greer violated the most serious of Jewish laws as well as the most serious of secular laws, i.e., the Jewish and secular laws that prohibit the rape and molestation of Jewish children, laws that prohibit underage drinking of alcohol and laws that prohibit the slaughtering of animals in residential properties.

9. Daniel Greer exercised complete dominion and control over the finances and business practices of the aforesaid entities in that there was no separate mind, will or existence of said entities, such control was used by the Defendant Daniel Greer in order to commit the wrongs and crimes alleged herein, such control was used to perpetrate the violation of a statutory or other positive legal duty alleged above, and such control

was used for dishonest or unjust acts alleged above, and the aforesaid control and breach of duty proximately caused the injuries alleged herein.

10. There was such a unity of interest and ownership that the independence of the organizations had in effect ceased or had never begun and treating said organizations as a separate identity would serve only to defeat justice and equity by permitting the economic entity to escape liability arising out of an operation conducted by one corporation for the benefit of the whole enterprise.

COUNT II

1 – 10. Paragraphs 1-10 of count one are hereby made Paragraphs 1-10 of Count II.

11. On or about September 18, 2016, while the Counterclaim Plaintiff ("Plaintiff") visited the synagogue located at 782 Elm Street, New Haven, CT intending to pray and observe religious services the Counterclaim Defendant ("Defendant") Daniel Greer appeared suddenly, and without warning, and while screaming unintelligibly, maniacally attacked the Plaintiff, violently pushed, shoved and kicked the Plaintiff and raised his clenched fist to the Plaintiff's head, in a uncontrolled fit of anger, and shoved the Plaintiff down the stairs of the synagogue located at 782 Elm Street.

12. When the Defendant raised his fist the Plaintiff was placed in fear of immediate physical and violent contact.

13. While the Defendant was physically inflicting a violent attack on the Plaintiff, the Plaintiff attempted to obtain his belongings from the synagogue with the intent to leave the premises.

14. The Defendant summoned and enlisted the help of others present at the

synagogue some of whom guarded the Plaintiff while others so summoned secured, searched and finally returned his belongings to the Plaintiff.

15. As a result of the Defendant violently and maliciously striking and battering the Plaintiff, the Plaintiff suffered physical pain and suffering and a severe shock to his entire nervous system.

16. As a result of the Defendant's assault and battery the Plaintiff has suffered humiliation in the community, damage to his reputation, pain and suffering and emotional distress and fear of future harm and further, unprovoked attacks by the Defendant.

COUNT III

1 – 14. Paragraphs 1-14 of count II are hereby made Paragraphs 1-14 of Count III.

15. Defendant Daniel Greer publicly humiliated and caused Plaintiff Lawrence Dressler emotional distress by intentionally physically attacking the Plaintiff in a public place of worship.

16. Defendant Daniel Greer publicly humiliated Plaintiff Lawrence Dressler, degraded the Plaintiff, and physically attacked the Plaintiff, causing Plaintiff Lawrence Dressler to suffer emotional distress

17. As a result, the Plaintiff suffered severe emotional distress.

18. The conduct of the Defendant described above was extreme and outrageous and was carried out for the purpose of causing the Plaintiff to suffer emotional distress.

COUNT IV

1 – 14. Paragraphs 1-14 of count II are hereby made Paragraphs 1-14 of Count IV.

15. In engaging in the conduct described in Paragraphs 1 through 14, the Defendant was negligent in that he knew, or in the exercise of reasonable care should have known, that such conduct would cause the Plaintiff, or any similarly-situated person of ordinary sensibilities, to suffer emotional distress so severe that it could cause physical illness.

16. As a result, the Plaintiff has suffered emotional distress.

WHEREFORE, the Counterclaim Plaintiff claims:

1. Money damages;
2. Punitive damages;
3. Any other and further relief as in law or equity may appertain.

THE COUNTERCLAIM PLAINTIFF,
LAWRENCE DRESSLER

BY: /s/ Joseph M. Merly

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His Attorney

CERTIFICATION

This is to certify that a copy of the foregoing was mailed on the above date,
postage prepaid, to all counsel and pro se parties of record, as follows:

William J. Ward, Esq.
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/s/ Joseph M. Merly- Juris No. 407102
JOSEPH M. MERLY